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January 23, 2015

BY FACSIMILE & U.S. MAIL

The Honorable Frank Maas
Chief United States Magistrate Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Courtroom 20A
New York, NY 10007-1312
Fax: (212) 805-6724

MEMO ENDORSED

Re: Travelers Indemnity Co., et al. v. Northrop Grumman Corp., et al., 12-3040-KBF (S.D.N.Y.)

Dear Judge Maas:

I write on behalf of Northrop Grumman in response to your Honor's request dated January 13, 2015 that Northrop Grumman update the Court on the status of the parties' negotiations that would resolve Phase II of the above-referenced matter. Pursuant to the parties' request of yesterday, Judge Forrest has issued an order extending the adjournment of Phase II proceedings until February 26, 2015, and setting a status conference for March 6, 2015. See Docket No. 643 (Jan. 23, 2015). As the parties indicated to Judge Forrest in their request, they have circulated draft settlement agreements, talked through differences, and bridged disagreements, but more time is necessary to complete their work. The parties hope to be able to announce to the Court by February 26 that they have signed final documents. If the Court deems it appropriate, Northrop Grumman will provide a renewed status report via letter on February 27. Counsel are available if Your Honor has any questions.

Respectfully submitted,

Georgia Kazakis/mrt
Georgia Kazakis

*sees - June 3/6/15
an update
mrt
USDC
1/23/15*

cc: Mary Beth Forshaw and Lynn K. Neuner (Travelers Counsel, by email)
Shane Heskin (Century Counsel, by email)